

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>ROCIO MARTINEZ, MARGARITA</b>	)	
<b>VILLALOBOS, ALEJANDRO</b>	)	
<b>RAMIREZ, and CHRISTIAN TAPIA,</b>	)	<b>CASE NO. 13-cv-7183</b>
<b>individually and on behalf of others</b>	)	
<b>similarly situated,</b>	)	<b>Judge Virginia Kendall</b>
	)	
<b>Plaintiffs,</b>	)	<b>Magistrate Judge Michael Mason</b>
	)	
<b>v.</b>	)	
	)	
<b>VALID USA, INC., DANIEL</b>	)	
<b>KHOURI, PARAMESWARI</b>	)	
<b>VELUCHAMY, PETHINAIDU</b>	)	
<b>VELUCHAMY, and TIMOTHY</b>	)	
<b>HOOKS,</b>	)	
	)	
<b>Defendants.</b>	)	

**PLAINTIFFS' MOTION FOR TENTATIVE FINAL APPROVAL OF CLASS ACTION  
SETTLEMENT, AUTHORIZATION TO DISTRIBUTE SETTLEMENT FUNDS, AND  
AWARD OF ATTORNEYS' FEES**

Pursuant to Fed. R. Civ. P. 23(e), Plaintiffs move this Court to enter a tentative order finally approving the Settlement Agreement that this Court preliminarily approved on May 26, 2015. In support of this Motion, Plaintiffs have submitted a Memorandum in Support of Their Motion for Tentative Final Approval of Class Action Settlement and Award of Attorneys' Fees. A draft order is attached as Exhibit 5 to that Memorandum.

As discussed further in the memorandum of law, the parties are asking for an order *tentatively* approving their class action settlement because Defendant Khouri's attorney did not timely mail Class Action Fairness Notice, as required by 28 U.S.C. § 1715(b) and the parties' settlement agreement. As a result, the Court cannot grant final approval of the settlement and dismiss the case with prejudice for ninety days. See *id.* § 1715(d).

WHEREFORE, Plaintiffs ask the Court to enter the order attached as Exhibit 5 to Plaintiffs' Memorandum in Support of Their Motion For Final Approval of Class Action Settlement and Award of Attorneys' Fees, or such similar order as the Court deems appropriate.

Respectfully submitted,

/s/ Christopher J. Wilmes

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